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September 28, 2021

By ECF

The Honorable Sarah Netburn
United States Magistrate Judge
Southern District of New York
40 Foley Square, Room 430
New York, New York 10007

Re: *In re Terrorist Attacks on September 11, 2001*
03 MDL 1570 (GBD) (SN)

This document relates to:

*Kathleen Ashton, et al. v. Al Qaeda Islamic Army, et al., Case No. 02 Civ. 6977
Thomas Burnett, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al., No. 03 Civ.
9849*

*Federal Insurance Co., et al. v. Al Qaida, et al., No. 03 Civ. 6978
Continental Casualty Co., et al. v. Al Qaeda, et al., No. 04 Civ. 5970
Euro Brokers Inc., et al., v. Al Baraka, et al., No. 04 Civ. 7279
Estate of John P. O'Neill et. al., v. Al Baraka et. al., No. 04 Civ. 1923*

Dear Judge Netburn:

We write on behalf of our client, defendant Yassin Kadi, in response to the Court's order filed September 27, 2021 (ECF 7146).

Mr. Kadi has proffered one expert witness, Jonathan Benthall. Mr. Benthall offers opinions on the role of charitable giving in Islam; the importance of cultural and historical norms in respect of an organization's charitable activities; Muslim charities' provision of aid in countries

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plagued by poverty, disasters, wars, and lack of education; the activities and character of the Muwafaq Foundation; and the flaws in the reports of Victor Comras, Plaintiffs' expert witness against Yassin Kadi.

Respectfully,

s/
Peter C. Salerno

cc: All MDL Counsel of Record (via ECF)